

ROTHMAN, SCHNEIDER, SOLOWAY & STERN, LLP

Attorneys at Law
100 Lafayette Street, Suite 501
New York, NY 10013

Franklin A. Rothman
Jeremy Schneider
Robert A. Soloway
David Stern

Tel: (212) 571-5500
Fax: (212) 571-5507

Rachel Perillo

January 17, 2024

By ECF

The Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: United States v. Ian Haylock
19 Cr. 846 (KPF)

Dear Judge Failla:

I am the attorney for Ian Haylock in the above-referenced matter, having been appointed to represent Mr. Haylock in relation to his motion for a sentence reduction, which is currently due on or before January 19, 2024. The government's response is due on or before February 16, 2024. This letter is respectfully submitted without objection from the government, by AUSA Juliana Murray, to request a 45-day extension of the current motion deadlines.

An extension is needed to allow more time for the receipt and review of important medical records needed for Mr. Haylock's motion. A few weeks ago, Mr. Haylock, who is incarcerated at FCI Otisville, was seen by the medical department and informed of a medical issue that requires additional testing. We have requested his medical records but have not yet received them. Because Mr. Haylock's medical history is relevant to his motion for a sentence reduction, we respectfully seek an extension of 45 days, which should allow sufficient time to obtain and review his records before filing our submission.

We have conferred with Mr. Haylock and he consents to the requested extension for the purpose of obtaining his updated medical records.

If the Court has any questions regarding this application, please do not hesitate to contact me.

Respectfully submitted,

/s/

Jeremy Schneider

Hon. Katherine Polk Failla
January 17, 2024
Page Two

cc: AUSA Juliana Murray, AUSA Louis Pellegrino
(By ECF)

Application GRANTED. The deadline to file Mr. Haylock's motion for a sentence reduction is hereby ADJOURNED to **March 4, 2024**. The Government's response shall be due on or before **April 3, 2024**.

The Clerk of the Court is directed to terminate the pending motion at docket number 378.

Dated: January 17, 2024
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE